



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Air Act Inspection of Cronimet Specialty Metals USA, Inc.
– Greenville
Inspection Date(s): 09/13/2022
Regulatory Program(s): MACT
Company Name: Cronimet Specialty Metals USA, Inc.
Facility Name: Cronimet Specialty Metals USA, Inc.
Facility Location: 209 Reynolds Industrial Park Road
Greenville, PA 16125
Latitude: 41.35092 **Longitude:** -80.4062
County/Parish: Mercer
AFS Number: 110070360410
Permit Number: SOOP 43-385A
NAICS Code: 423510 **SIC:** 5051
Unique Project #: 3E22CA038A

Facility Representatives: **Point of Contact**
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EPA Lead Inspector

Signature

Paul Arnold

Date

Four Penn Center – 1600 John F Kennedy Blvd
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Supervisor

Signature

Kristen Hall

Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Cronimet Specialty Metals USA, Incorporated (Cronimet or Facility) to verify compliance with applicable State and Federal regulations. The Pennsylvania Department of Environmental Protection (PADEP) was notified of the inspection on August 31, 2022, via email. On September 8, 2022, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Tina Shacklock, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

A. Summary of the Facility

The Facility is located at 209 Reynolds Industrial Park Rd, Greenville, PA 16125. Cronimet specializes in the wholesale trade of metals that contain Nickel (Ni), Cobalt (Co) and Tungsten (W). Cronimet purchases and physically sorts metal batches, usually by Ni, Co and W content, for resale according to customer specifications. Cronimet has been operating at the Greenville Facility since 2016 and has 23 employees. The Facility operates from 7:30 AM to 3:30 PM, Monday through Friday.

The Facility received Plan Approval 43-385A (Plan Approval) from PADEP issued on September 26, 2019.

Cronimet is classified as a minor source for Particulate Matter (PM), Oxides of Nitrogen (NO_x) and Hazardous Air Pollutants (HAP). The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR Part 60 Subpart CCCC, Standards of Performance for Commercial and Industrial Solid Waste Incineration Units
- 40 CFR Part 60 Subpart DDDD, Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units
- 40 CFR Part 63 Subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

B. Inspection Opening Conference

At 9:00 AM on September 13, 2022, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Cronimet was represented by Tina Shacklock, General Manager, and Buck Baldwin, Environmental Consultant. Also, Mark Novak and Rob Recker, of PADEP, were present for the inspection. EPA inspectors, Paul Arnold and Stafford Stewart, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Tina Shacklock did claim all photographs and

documentation obtained during the inspection as CBI. However, on September 30, 2022, Tina Shacklock rescinded her CBI Claim on all photographs and documentation.

II. Site Activity/Process Description

Cronimet receives, by truck, scrap metal with Co, Ni and W content from various suppliers. Cronimet accepts metal turnings, grindings, shavings, stampings, plates, and paper filters with metal content. The scrap metals usually arrive in 55-gallon drums or large totes. When scrap metals first arrive at Cronimet, it is weighed, separated by metal type and tested, via a Niton, for Co, W and Ni content. A Niton is a handheld, non-destructive electronic testing device. Sometimes purchased metals arrive damp and must be dried before they can be further processed. In those instances, the load of scrap metal is placed inside one of three gas-fired burn-off ovens to burn off moisture. The three burn-off ovens, each rated at 0.8 MMBtu/hr, are also permitted to process paper filters to recover metal content. The burn-off ovens are required, by Plan Approval, to maintain a minimum operating temperature of 1,400° Fahrenheit. The burn-off ovens are not permitted to process halogenated hydrocarbons, such as PVC and Teflon. The burn-off ovens are vented, uncontrolled, to the atmosphere.

Sometimes, depending upon the job and batch, metal pieces need a size reduction and are sent through a crusher. Cronimet has two crushers. Each crusher has its own dedicated baghouse. Both baghouses are vented inside the building and have no operating parameters or permit conditions. All processed metal is then stored by metal type and percent content until it can be dry blended (not melted) to achieve a batch of metal pieces that has the percentage of Co, Ni or W desired by a customer. The metal blend is then shipped to customers via truck. Monthly, Cronimet currently processes about 1.6 thousand pounds of metal.

Cronimet has no boilers or power generators.

The opening conference concluded at 10:00 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:05 AM by Tina Shacklock of Cronimet. Mark Novak and Rob Recker, of PADEP, were also present for the walkthrough. EPA inspectors noted photographs would be taken during the Facility walkthrough (Attachment 2). All photographs were taken during the inspection by Stafford Stewart.

Metals arrive (Photographs 1 & 2) at the Facility and are weighed and sorted by metal content. Once separated, if needed, the metals are dried in one of three burn-off ovens (Photographs 10 – 16). The burn-off ovens vent uncontrolled outside of the building to the atmosphere. All three burn-off ovens were observed operating above 1,400° Fahrenheit. Sometimes received metals require resizing and are sent to one of two crushers (Photographs 5 – 7) to achieve a reduction in size. Neither of the two crushers were observed operating during the walkthrough. Both

crushers' exhausts were ducted to dedicated baghouses and both baghouses had exhausts that vented indoors.

After a shipment of metal has completed the processing steps of, weighing; sorting; drying (if needed); and crushing (if needed), it is stored onsite until portions of the Co, Ni or W containing metals are combined to create a batch of outgoing metals. Various piles and bins of sorted metals were observed. (Photographs 3,4 &9)

The walkthrough concluded at 11:05 AM

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IV. Records Review

The records review commenced immediately after the plant walkthrough at 11:05 AM. EPA inspectors reviewed documents requested in the September 8, 2022, email to Tina Shacklock (see Attachment 1). Records were provided at the time of the inspection by Tina Shacklock. Below are the records requested and what was provided:

Cronimet provided a facility floorplan and the current Plan Approval. Cronimet also provided the temperature logs, for all three burn-off ovens, from January 2019 through March 2022. The logs that were reviewed during the inspection indicated that all three ovens operated consistently above 1,400° Fahrenheit. Cronimet provided the annual usage of natural gas, for the years 2019 through August 2022. Cronimet has neither a permit limit for natural gas combustion, nor hourly or annual emission limits

EPA requested, but Cronimet did not have, facility emission records of Oxides of Nitrogen (NO_x), Particulate Matter (PM), Volitive Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). EPA requested that Cronimet provide those records at a later date.

V. Closing Conference

After the records review, EPA inspectors, Tina Shacklock, Buck Baldwin, Mark Novak and Rob Recker had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final reports do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 12:05 PM.

The following has been identified as a *potential* issue during the inspection. It is an issue that requires either further investigation by EPA or additional information or explanation by Cronimet.

- Cronimet did not have NOx, PM, VOC and HAP emission records available for review during the site visit. EPA requested that Cronimet provide emission records by September 23, 2022.

VI. List of Attachments

- Attachment 1: Email correspondence to Tina Shacklock of records requested to review during inspection
- Attachment 2: Photo Log

Attachment 1

From: Arnold, Paul
Sent: Thursday, September 08, 2022, 3:03 PM
To: tshacklock@cronimetspecialtymetals.com
Cc: Stewart, Stafford
Subject: Clean Air Act Inspection on September 13 & 14, 2022

Hi Tina,

As I discussed with your coworker earlier today, EPA plans to conduct a Clean Air Act Inspection of two Cronimet Specialty Metals facilities on September (Greenville, PA) 13 & 14 (Wheatland, PA), 2022. We plan to arrive at the Greenville location @ 9:00 am. PADEP has been notified and a representative(s) from that office may attend. To help expedite the inspection, please provide answers to the following questions, for each facility, upon our arrival. If you have any questions or concerns, please contact me.

Pre-inspection questions:

1. A process flow diagram or facility floorplan/layout.
2. All stack test/emission test results for any/all pollutants tested.
3. If Cronimet has ever submitted an initial notification and/or compliance statements for any NESHAP or NSPS, please have a copy of these available for review.
4. If Cronimet has ever submitted an air permit application, or RFD, please have a copy available for review.
5. Provide a copy of Cronimet's current air operating permit.
6. Provide a record of annual facility air emissions, from January 2019 to present, for all regulated air pollutants (NO_x, CO, SO_x, VOCs, HAPs, and PM).
7. Provide a listing of all onsite boilers, emergency generators and all other internal combustion sources. Please include details such as fuel combustion type, installation dates, engine size, and boiler rating and all NSPS and NESHAP regulations applicable to those engines, internal combustion units and boilers.
8. Provide annual fuel usage for any onsite internal combustion sources, including boilers and emergency generators. Exclude fuel combustion used for comfort heat.
9. Provide a copy of the sulfur content of all oil deliveries, if applicable, from 2019 to present.
10. Provide a listing of all air pollution control devices. Please include make, model, control/removal efficiency and installation date.
11. Provide all records required by the current air operating permit, including, but not limited to; pressure drop, VOC, NO_x, HAP and PM emission limits, VE readings, VOC content of coatings.

Thank you, Paul

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Cronimet – Greenville, PA



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Photo 1 – Accumulation Area

Cronimet – Greenville, PA



9/13/2022

Photo 2 – Metal turnings

Cronimet – Greenville, PA



9/13/2022

Photo 3 – NiCo pile

Cronimet – Greenville, PA



9/13/2022

Photo 4 – Tungsten

Cronimet – Greenville, PA



9/13/2022

Photo 5 – Grand Slam Crusher

Cronimet – Greenville, PA



9/13/2022

Photo 6 – Grand Slam Baghouse

Cronimet – Greenville, PA



9/13/2022

Photo 7 – Small crusher & baghouse

Cronimet – Greenville, PA



Photo 8 – Sifters

Cronimet – Greenville, PA



9/13/2022

Photo 9 – NiCo product

Cronimet – Greenville, PA



9/13/2022

Photo 10 – Burn-off Oven #3

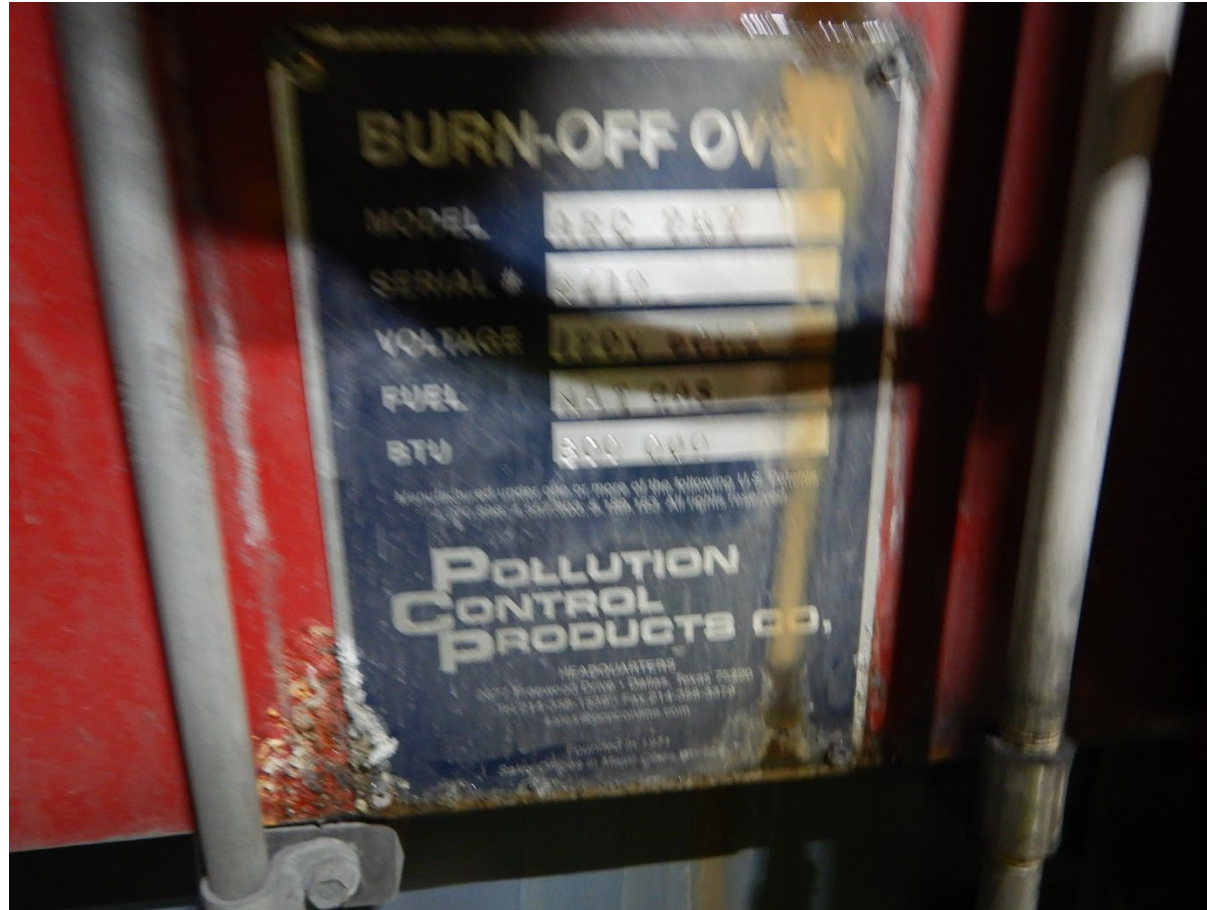
Cronimet – Greenville, PA



9/13/2022

Photo 11 – Oven #3 temperature

Cronimet – Greenville, PA



Cronimet – Greenville, PA



9/13/2022

Photo 13 – Oven #2 temperature

Cronimet – Greenville, PA



9/13/2022

Photo 14 – Burn-off Oven # 1

Cronimet – Greenville, PA



Cronimet – Greenville, PA



9/13/2022

Photo 16 – Oven # 1 temperature